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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, DENIS  
MOLINA, JHONY SILVA, MARIA ELENA  
HERNANDEZ, SANDHYA LAMA, TEOFILO  
MARTINEZ,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as  
Secretary of Homeland Security, UNITED  
STATES DEPARTMENT OF HOMELAND  
SECURITY, and UNITED STATES OF  
AMERICA,

Defendants.

Case No. 3:25-cv-05687-TLT

**NOTICE AND REQUEST FOR JUDICIAL  
NOTICE OF NEW TPS TERMINATION  
DECISIONS**

Complaint filed: July 7, 2025

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1 Plaintiffs hereby provide notice and request the Court take judicial notice of three  
2 additional Temporary Protected Status termination decisions issued by Defendants since this  
3 Court's November 18, 2025 hearing on the parties' cross motions for summary judgment. *See* 90  
4 Fed. Reg. 58,028 (Dec. 15, 2025) (Ethiopia); 90 Fed. Reg. 53,378 (Nov. 25, 2025) (Burma  
5 (Myanmar)); 90 Fed. Reg. 54,733 (Nov. 28, 2025) (Haiti). These decisions bring the total number  
6 of TPS termination decisions since the second Trump Administration took office to thirteen  
7 terminations for eleven countries (including two terminations each for Venezuela and Haiti). *See*  
8 90 Fed. Reg. 9040 (Feb. 5, 2025) (Venezuela 2023); 90 Fed. Reg. 20,309 (May 13, 2025)  
9 (Afghanistan); 90 Fed. Reg. 23,697 (June 4, 2025) (Cameroon); 90 Fed. Reg. 24,151 (June 6,  
10 2025) (Nepal); 90 Fed. Reg. 28,760 (July 1, 2025) (Haiti); 90 Fed. Reg. 30,089 (July 8, 2025)  
11 (Honduras); 90 Fed. Reg. 30,086 (July 8, 2025) (Nicaragua); 90 Fed. Reg. 43,225 (Sept. 8, 2025)  
12 (Venezuela 2021); 90 Fed. Reg. 45,398 (Sept. 22, 2025) (Syria); 90 Fed. Reg. 50,484 (Nov. 6,  
13 2025) (South Sudan).

14 The new terminations are relevant to Plaintiffs' claim that the terminations challenged in  
15 this case are "based on [Defendants'] preordained determination to end the TPS program, rather  
16 than an objective review of country conditions," because they continue Defendants' pattern of  
17 terminating TPS for every country that has come up for periodic review. Dkt. 73 at 21. *See* Dkt.  
18 144 at 16-20 (seeking summary judgment on this claim). Further, as notices published in the  
19 Federal Register, they are properly subject to judicial notice. *Kanfer v. Pharmicare US, Inc.*, 142  
20 F. Supp. 3d 1091, 1099 (S.D. Cal. 2015) ("The contents of the Federal Register are noticeable as a  
21 matter of law.") (citing 44 U.S.C. § 1507, which states "[t]he contents of the Federal Register shall  
22 be judicially noticed").  
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Date: December 17, 2025

Respectfully submitted,

NATIONAL DAY LABORER ORGANIZING  
NETWORK

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